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August 25, 2016

By ECF

Hon. Frederick J. Scullin, Jr.
United States District Court
for the Northern District of New York
100 South Clinton Street
Syracuse, New York, 13261
Re: *Pidot, et al. v. New York State Board of Elections*, et al. No. 16-0859.

Dear Judge Scullin:

On behalf of the Defendant-Intervenor Jack Martins' and pursuant to Local Rule 7.1(b)(2), Mr. Martins respectfully requests that this Court grant Defendant-Intervenor Jack Martins leave to file a reply brief in support of his Motion For Relief From Judgment pursuant to Fed. R. Civ. P. 59 and 60.

On August 19, 2016, Mr. Martins filed a Motion for Relief From Judgment. (Dkt. No. 68). Later, on that same day, the Court ordered the parties to file opposition briefs by August 25, 2016. (Dkt. No. 71). The Court further ordered oral argument to be held at 4 pm on August 30, 2016. *See id.* Mr. Martins requests that this Court permit him to file a reply brief no later than noon on Monday August 29, 2016.

First, this Court should grant Mr. Martins leave to file a reply brief. Because the issues raised in Mr. Martins' brief were in response to the Court's order of an October 6, 2016 primary, none of the previous legal filings discussed the issues raised in Mr. Martins' Motion. This Court would therefore benefit from the additional authority and clarity a reply brief could give. This would also provide for a more productive hearing on August 30.

Second, the issues raised in Mr. Martins Motion for Relief From Judgment are of the highest importance. They are concerned with voter confusion and violations of Mr. Martins' constitutional rights guaranteed under the Equal Protection Clause of the Fourteenth Amendment. Because of these grave issues, this Court should permit full briefing and grant Mr. Martins leave to file a reply brief.

Mr. Martins sincerely appreciates the Court's consideration of this matter.

Respectfully Submitted,

/s/ Jason Torchinsky

Jason Torchinsky (NDNY Bar No. 107395)*

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cc: All counsel of record (via ECF)

So ordered

Hon. Frederick J. Scullin, Jr.
United States District Judge